

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

SCOTT TURNAGE , CORTEZ D. BROWN,  
DEONTAE TATE, JEREMY S. MELTON, ISSACCA  
POWELL, KEITH BURGESS, TRAVIS BOYD,  
TERRENCE DRAIN, and KIMBERLY ALLEN on  
behalf of themselves and all similarly situated persons,

PLAINTIFFS,

V.

BILL OLDHAM, in his individual capacity as former Sheriff of Shelby County, Tennessee; FLOYD BONNER, JR., in his official capacity as Sheriff of Shelby County, Tennessee; ROBERT MOORE, in his individual capacity as former Jail Director of Shelby County, Tennessee; KIRK FIELDS, in his official capacity as Jail Director of Shelby County, Tennessee; CHARLENE McGHEE, in her individual capacity as former Assistant Chief of Jail Security of Shelby County, Tennessee; REGINALD HUBBARD, in his official capacity as Assistant Chief of Jail Security of Shelby County, Tennessee; DEBRA HAMMONS, in her individual capacity as former Assistant Chief of Jail Programs of Shelby County, Tennessee; TIFFANY WARD in her official capacity as Assistant Chief of Jail Programs of Shelby County, Tennessee; SHELBY COUNTY, TENNESSEE, a Tennessee municipality; TYLER TECHNOLOGIES, INC., a foreign corporation; GLOBAL TEL\*LINK CORPORATION, a foreign corporation; SOFTWARE AG USA, INC., a foreign corporation; and SIERRA-CEDAR, INC., a foreign corporation, SIERRA SYSTEMS GROUP, INC., a foreign corporation.

DEFENDANTS.

**Case No. 2:16-cv-2907-SHM/tmp**

**CLASS ACTION  
COMPLAINT FOR  
VIOLATIONS OF THE  
CIVIL RIGHTS ACT OF  
1871, 42 U.S.C. § 1983,  
TENNESSEE COMMON  
LAW, DECLARATORY, AND  
INJUNCTIVE RELIEF**

**JURY TRIAL DEMANDED  
PURSUANT TO FED. R.  
CIV. PRO. 38(a) & (b)**

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**NOTICE TO TAKE THE DEPOSITION OF FLOYD BONNER**

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To: Floyd Bonner  
c/o Robert E. Craddock, Esq.  
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Please take notice that pursuant to Rule 30(a)(1) of the Federal Rules of Civil Procedure, Plaintiffs Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, the Estate of Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen will take the deposition of Floyd Bonner, individually, via teleconference<sup>1</sup>, commencing on **Thursday, August 27, 2020 at 9:30 a.m.**, Central Standard Time, and continuing thereafter from hour to hour and day to day until complete.

The deposition will be taken on behalf of Plaintiffs for the purposes of discovery, use as

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<sup>1</sup> "Teleconference" is defined to mean any means of taking the deposition that utilizes telecommunications technology including, but not limited to, telephone, videoconference, Voice Over Internet Protocol audio. The specific details of the method shall be provided either by the attorney noticing this deposition or by the entity providing the teleconference service. The method of taking the deposition shall govern the manner in which exhibits shall be presented to the deponent, but the deponent should be prepared to have access to a computer with a high-speed internet connection, video capability, Adobe Flash, and a Google Chrome browser. As of the date of this Notice, the attorney giving notice of the deposition intends to utilize Huseby Connect or Zoom as the specific mechanism to take the deposition. In the event that this is not feasible for the deponent, deponent should contact the attorney giving notice of this deposition as soon as practicable to make alternative arrangements.

evidence, preservation of testimony, and all other purposes authorized by law and will be recorded by a certified court reporter through Zoom, who will record the deposition by means of stenograph and/or audio recordings. The deposition may also be recorded by video or other visual and electronic means. A representative from the court reporting agency will contact all attorneys that are parties to this action in order to provide the Zoom invite prior to the date of the deposition.

Respectfully submitted,

s/ William E. Routt, III

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**CERTIFICATE OF SERVICE**

The undersigned certifies that the foregoing has been filed via the Court's ECF system this 4<sup>th</sup> day of August, 2020, for service on all persons registered in connection with this case, including:

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